

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X		:	
MICHAEL KANE, et al.,		:	
	Plaintiffs,	:	
		:	
- against -		:	Case No. 21-cv-7863 (NRB)
		:	(Lead)
BILL DE BLASIO, et al.,		:	
	Defendants.	:	
-----X		:	
MATTHEW KEIL, et al.		:	
	Plaintiffs,	:	
		:	
- against -		:	Case No. 21-cv-8773 (NRB)
THE CITY OF NEW YORK, et al.,		:	
	Defendants.	:	
-----X		:	

**DECLARATION OF ANDREW C. HRUSKA, ESQ. IN SUPPORT OF
PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND COSTS**

ANDREW C. HRUSKA, ESQ., an attorney admitted to practice before this Court, declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true:

1. I have been requested to offer an opinion with respect to the reasonableness of the hourly rates requested by Plaintiffs' counsel in this case.

Background

2. I am a partner of King & Spalding LLP in our New York office and have been since 2005. I lead our Special Matters & Government Investigations team in New York. My practice includes *pro bono* representation of plaintiffs in civil rights cases, especially with regard to First Amendment rights.

3. Before entering private practice, I served as Chief Assistant U.S. Attorney for the Eastern District of New York, and before that as a Department of Justice official, a New York County Assistant District Attorney and as a law clerk to U.S. Circuit Judge Ralph K. Winter, Jr. I graduated from Yale Law School in 1993.

4. I am admitted to practice in the state of New York; the United States Supreme Court, the United States Courts of Appeals for the Second, Tenth and D.C. Circuits; and in the Southern, Eastern, Western and Northern Districts of New York. I have also made *pro hac vice* appearances in other federal district courts.

5. For the bars and courts in which I have been admitted, I am a member in good standing and there are no grievances or other disciplinary proceedings pending against me. In addition, no court has ever censured, disbarred, suspended, or held me in contempt.

Reasonableness of Hourly Rate

6. I have reviewed the rate applications from attorneys for the plaintiffs Sujata Gibson and Jonathan Nelson on behalf of his firm Nelson Madden Black.

7. I am familiar with the hourly billing rates of attorneys who litigate complex matters in this district.

8. The billing rates of \$550 per hour for Ms. Gibson and for Mr. Nelson and his partners are at or below the prevailing market rates in the Southern District of New York for partner-level attorneys with substantial experience in the litigation of complex matters.

9. The billing rates of \$300-350 per hour for associate time and \$135 for paralegal time are also at or below prevailing market rates in the Southern District of New York for litigation of this complexity.

Dated: New York, New York

September 13, 2022

Respectfully submitted,

Andrew C. Hruska

Andrew C. Hruska, Esq.
AH 3224